

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA

Criminal Action No. 4:18cr00011

v.

MARCUS JAY DAVIS,
Defendant

DEFENDANT'S OBJECTION TO MOTION TO LIMIT DISCLOSURE

Comes now the defendant, Marcus Jay Davis, by counsel, and hereby OBJECTS to the government's "*Emergency*" *Motion to Limit Disclosure* of certain items, ECF Doc. 267, and to the continuation of the Court's oral order¹ for the reasons stated in the *Motions to Deny* filed by Defendants Montez Lamar Allen² and the *Motion in Opposition* filed by Javontay Jacquis Holland.³

Such an extraordinary and broad remedy as requested by the government should be granted by the Court only after a thorough evidentiary hearing and a finding that the proposed remedy is both necessary and narrowly-tailored to address a harm that actually exists.

Respectfully submitted this 7th day of December, 2018,

MARCUS JAY DAVIS
By: s/ Anthony F. Anderson
s/ Beverly M. Davis
Counsel for Defendant

¹ The oral order was issued by email from the Court dated December 4, 2018.

² ECF Docs. 205 and 210 in Case No. 4:18cr00012

³ ECF Doc. 208 in Case No. 4:18cr00012

Anthony F. Anderson
Anderson & Freedman
1102 Second Street, S. W.
P.O. Box 1525
Roanoke, VA 24007
(540) 982-1525
afa@afalaw.com

Beverly M. Davis
Davis, Davis & Davis Attorneys
P.O. Box 3448
Radford, Virginia 24143
(540) 639-9081
bevdavis@davisattys.com

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, 2018, I electronically filed the foregoing Defendant's Objection to Motion to Limit Disclosure with the Clerk of Court using the CM/ECF System which will send notification of such filing to all parties.

s/ Beverly M. Davis
Beverly M. Davis
Davis, Davis & Davis Attorneys
P.O. Box 3448
Radford, Virginia 24143
(540) 639-9081
bevdavis@davisattys.com
Counsel for Defendant